

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>V.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p> <p><b>PLAINTIFF CHARLENE CARTER'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A RENEWED MOTION TO COMPEL</b></p>
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Pursuant to Fed. R. Civ. P. Rule 6(b), Plaintiff Charlene Carter requests that the Court grant her a one-week extension, from August 14, 2020, to August 21, 2020, to file any renewed motion to compel as provided for in this Court's June 23, 2020 Discovery Order (ECF 99). In support of this Motion, Carter states as follows:

1. Under Fed. R. Civ. P. 6, the Court may, for good cause, extend the time to act when an act may or must be done within a specified time.
2. The Court's June 23 Discovery Order ordered Local 556 to serve Carter with an amended privilege log by July 31, 2020, and stated that Carter may renew her Motion to Compel challenging Local 556's privilege claims as to specific documents by August 14, 2020. (ECF 99, p.3).
3. The Court's June 23 Discovery Order also ordered Local 556 to produce documents, and required Carter and Local 556 to confer by August 14, 2020, regarding issues involving Requests for Production Nos. 18, 19, 21-23. (ECF 99, p.4).
4. Following the Court's June 23 Discovery Order, Carter and Local 556 conferred by telephone on or about July 1, July 28, and August 7, regarding Requests for Production Nos. 9, 10,

13, 18, 19, 21-23, and Interrogatory 3, and other issues related to the Order and Carter's Motion to Compel. During their August 7 telephone call, Local 556 stated that it planned to serve Carter with additional Amended Responses the following week. Carter and Local 556 agreed during the call that in the following week they might be able to resolve certain disputes and narrow the scope of issues that would be presented as part of a renewed motion to compel.

5. On July 31, 2020, Local 556 filed an Unopposed Motion to Extend the Deadline for Compliance with the Discovery Order to August 3, 2020 (ECF 114), which the Court granted (ECF 115). On August 3, Local 556 served Carter with the amended privilege log. During their August 7, 2020 telephone conversation, Carter raised issues with Local 556 about its August 3 amended privilege log. Local 556 indicated that it would look into Carter's questions and attempt to provide her with some answers.

6. Accordingly, Carter requests a one-week extension until August 21, 2020, to file a renewed motion to compel. There is good cause to grant the requested extension because it will allow Carter and Local 556 additional time to resolve or narrow remaining disputes related to Carter's Motion to Compel, the Discovery Order, and the amended privilege log. Carter's counsel conferred via phone with Local 556's counsel, Edward Cloutman, who is unopposed to this extension.

For the foregoing reasons, the Court should grant Carter's Motion for Extension of Time to File a Renewed Motion to Compel, and set a new August 21, 2020 deadline for the renewed motion.

Dated: August 12, 2020

Respectfully submitted,

s/ Matthew B. Gilliam  
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s/ Jason E. Winford (with permission)

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*Attorneys for Plaintiff Charlene Carter*

**Certificate of Conference**

I hereby certify that on August 12, 2020, Plaintiff Charlene Carter's counsel, Matthew B. Gilliam, conferred with counsel for Defendant Transport Workers Union of America, Local 556, Edward B. Cloutman, by telephone, and discussed filing this motion for extension of time and its contents. Edward Cloutman responded that this motion would be unopposed.

s/ Matthew B. Gilliam

**Certificate of Service**

I hereby certify that on August 12, 2020, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam